

**IN THE CIRCUIT COURT OF
BARBOUR COUNTY, ALABAMA
CLAYTON DIVISION**

GARY WILLIS and GINA WILLIS)	
)	
Plaintiffs,)	
)	
vs.)	CV-2004-35
)	
FREEDOM MORTGAGE CORPORATION; et al.,)	
)	
Defendants.)	

MOTION TO AMEND COMPLAINT

Come now the Plaintiffs, Gary Willis and Gina Willis, and move for leave to amend their complaint in accordance with their separately filed amendment and, as support thereof, show as follows:

1. When the Plaintiffs originally filed their complaint on April 8, 2004, they stated that they were not seeking more than \$74,999 for all counts of their complaint.

2. In the recent deposition of the 30(b)(6) representative of Freedom Mortgage, Freedom Mortgage admitted that the failure to provide the Plaintiffs with a mortgage at the rate of 5.375% was as a result of a "mistake" by Freedom Mortgage Corporation, Inc. The Defendant further admitted that it made no attempt to determine the damages to the Plaintiffs as a result of the Defendant's "mistake."

3. This admission by Freedom Mortgage Corporation, Inc., which was previously unknown to the Plaintiffs has significantly changed the Plaintiffs' evaluation as to the value of their case. Plaintiffs now believe that they have a much more significant punitive damage claim against the Defendant.

**Attachment
K**

WHEREFORE, Plaintiffs move to amend their ad damnum clause in each count of their complaint to ask for compensatory and punitive damages of One Million Dollars (\$1,000,000.00), plus costs.

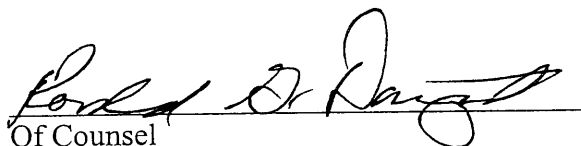

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing mail the all counsel of record by placing a copy thereof, in the United States mail, postage prepaid, on this the 28TH day of April, 2005, and properly addressed as follows:

Cliff Slaten, Esq.
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Of Counsel